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# **Richland County Government**

BUREAU OF AIR QUALITY

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## **Office of the County Administrator**

December 23, 2008

L. Nelson Roberts  
SCDHEC, Bureau of Air Quality  
2600 Bull Street  
Columbia, SC 29201  
[robertln@dhec.sc.gov](mailto:robertln@dhec.sc.gov)

**RE: 2008 Ground Level Ozone Non-Attainment Boundary Recommendations**

Dear Mr. Roberts:

I am submitting this letter on behalf of Richland County Council in response to the Bureau of Air Quality's request for comments regarding the 2008 Ground Level Ozone Non-attainment Boundary.

Richland County staff recently met with representatives from neighboring counties and the Central Midlands Regional Council of Governments for the purpose of discussing the presumed non-attainment boundary for the Columbia area. Based on the anticipated criteria that will be used by DHEC and the U.S. Environmental Protection Agency to determine non-attainment boundaries, Richland County is recommending that the 2008 Ground Level Ozone Non-attainment Boundary follow the **2000 Columbia Area Transportation Study (COATS) area, excluding areas in Southwestern Kershaw County and Northwestern Calhoun County.** A map displaying this area is enclosed with this letter.

The 2000 COATS boundary was developed by the Central Midlands Council of Governments (CMCOG) with input and feedback from local jurisdictions. This area takes into account several factors, such as population density, projected growth, and commuting patterns through the year 2035.

We believe that the 2000 COATS boundary (excluding portions of Kershaw and Calhoun Counties) is a logical non-attainment boundary because it meets a majority of the criteria used by the EPA in 1997 when determining non-attainment boundaries, and will also include consideration for SCDHEC criteria as well:

- 1) **The boundary includes areas of Richland County where monitors exceed the new ozone standard, as well as the most urbanized areas of neighboring Lexington County where no monitors are present.**
- 2) **The proposed boundary includes the areas with the highest levels of density and urbanization in the Central Midlands Region.**
- 3) **The proposed boundary is consistent with recent ozone monitoring data. The Congaree Bluff monitor, for example, indicates that outlying areas (such as the southeastern portion of Richland County) will comply with the new ozone standard.**
- 4) **The proposed boundary will cover the largest concentration of emissions sources in the Central Midlands Region, including highways, urban areas and industrial facilities.**
- 5) **By covering a majority of the region's MPO area, the proposed boundary will be consistent with traffic and commuting patterns, and will include suburban and outlying areas where a large number of residents commute on a daily basis.**
- 6) **The proposed boundary is consistent with current and projected growth patterns, as outlined in Richland and Lexington Counties' comprehensive plans.**
- 7) **The proposed non-attainment boundary will include jurisdictions that have a proven history of working together to achieve air quality goals and emission reductions in the region, including joint outreach, education, and public participation initiatives.**

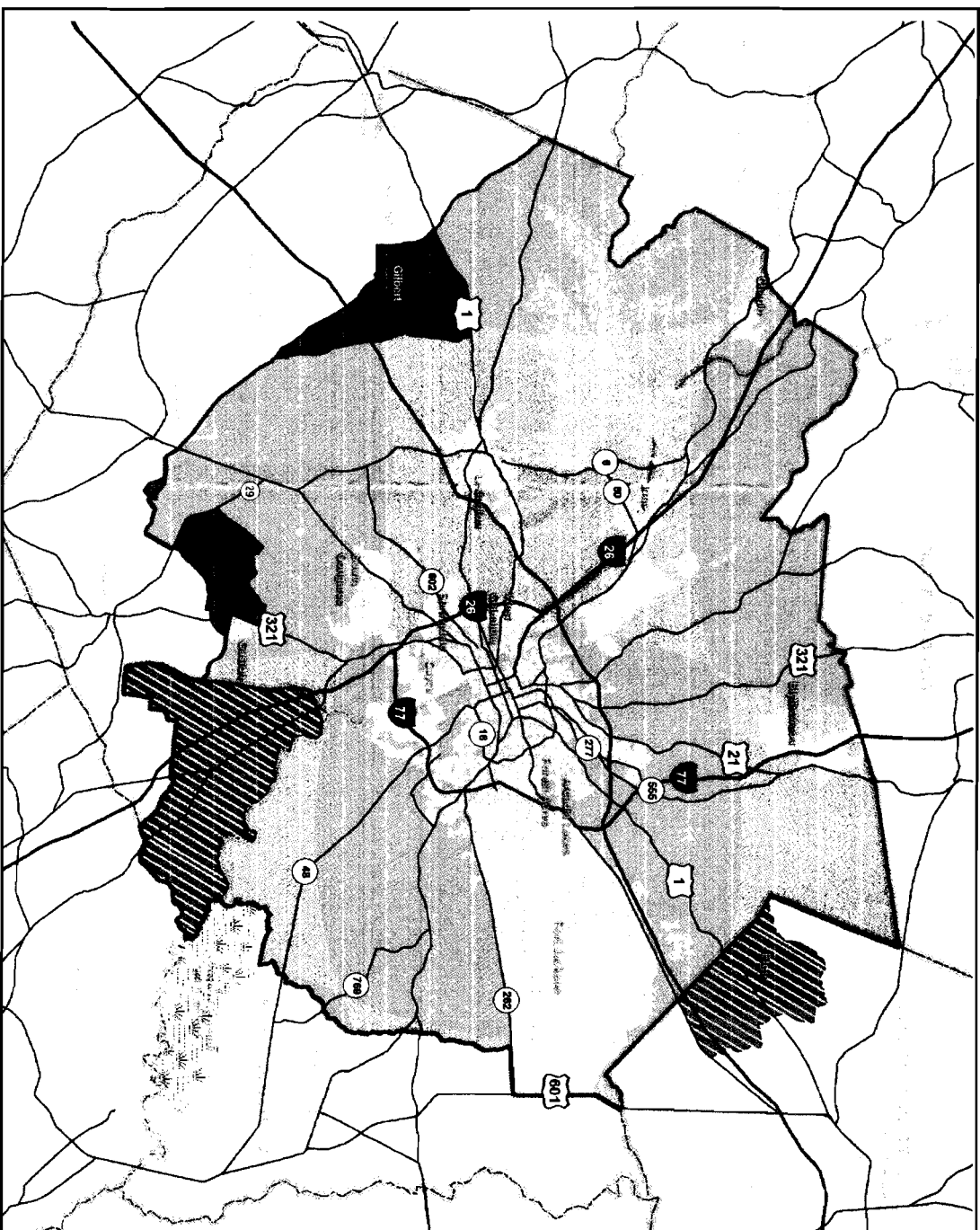
As a participant in the Early Action Compact process, Richland County has developed partnerships with neighboring communities and worked diligently on developing regional solutions to a regional problem. Over the last several years, Richland County has experienced dramatic decreases in ozone concentration, and as of December 31, 2007, Richland County met its goal of attaining the 1997 Ozone Standard.

Richland County is ready to continue to build upon our regional efforts as we strive to attain the 2008 Ground Level Ozone Standard. If you have any questions, please do not hesitate to contact my office at 803-576-2050.

Sincerely,








J. Milton Pope  
County Administrator



COATS Proposed  
EPA Presumptive  
Non-Attainment Boundary



- |   |   |
|---|---|
|  | COATS Boundary  |
|  | Proposed Addition to Previous EPA Presumptive Non-Attainment Boundary |
|  | Proposed Removal from Current COATS Boundary                          |
|  | Municipal Boundary  |
|  | County Boundary   |



**CENTRAL  
MIDLANDS**  
Council of Governments

Prepared on:  
November 25, 2008

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